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26 *Attorneys for Defendants*  
27 RUAG Ammotec GmbH, RUAG Hungarian  
28 Ammotec, Inc., and RUAG Holding AG

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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ARCHON FIREARMS, INC., a domestic  
corporation,

Plaintiff,

v.  
RUAG AMMOTEC GMBH, a foreign  
company; RUAG HUNGARIAN  
AMMOTEC, INC., a foreign company;  
RUAG AMMOTEC USA, INC., a foreign  
company; RUAG SCHWEIZ AG, a foreign  
company; RUAG HOLDING AG, a foreign  
company; RUAG AMMOTEC  
MAGYARORSZAGI ZRT., a foreign  
company; ARSENAL FIREARMS LTD., a  
foreign company; AF PRO TECH GROUP  
KFT, a foreign company; ARSENAL  
FIREARMS USA, LLC; DOE  
INDIVIDUALS I-X; and ROE  
CORPORATIONS I-X, inclusive,

Case No.: 2:20-cv-00227-GMN-NJK

**JOINT MOTION FOR EXTENSION  
OF TIME**

**(First Request)**

Defendant(s).

1 Plaintiff Archon Firearms, Inc. (“Plaintiff”) and Defendants RUAG Ammotec GmbH,  
2 RUAG Hungarian Ammotec, Inc., and RUAG Holding AG (collectively, “RUAG” and collectively  
3 with Plaintiff, the “Parties”), by and through their undersigned counsel, for good cause shown,  
4 hereby jointly request and agree as follows:

- 5 1. RUAG Ammotec GmbH filed a Motion to Dismiss or Stay the Action and Compel  
6 Arbitration, or in the Alternative, Motion to Dismiss the Complaint for Failure to State a  
7 Claim (Fed. R. Civ. P. 12(b)(6)) on February 13, 2020 [ECF Nos. 7] (“Motion to Dismiss”).  
8 2. RUAG Ammotec GmbH filed a Motion to Dismiss or Stay the Action and Compel  
9 Arbitration, or in the Alternative, Motion to Dismiss the Complaint for Failure to State a  
10 Claim (Fed. R. Civ. P. 12(b)(6)) on February 13, 2020 [ECF Nos. 8] (“Motion to Compel  
11 Arbitration”).  
12 3. RUAG Hungarian Ammotec, Inc., and RUAG Holding AG filed a Motion to Dismiss for  
13 Lack of Personal Jurisdiction on February 13, 2020 [ECF No. 10] (“Personal Jurisdiction  
14 Motion to Dismiss” and collectively with the Motion to Dismiss and Motion to Compel, the  
15 “Motions”).  
16 4. On March 5, 2020, Plaintiff filed a First Amended Complaint [ECF no. 39].  
17 5. Plaintiff filed an Opposition to the Motion to Dismiss [7] and Motion to Compel Arbitration  
18 [8] [ECF No. 40] on March 5, 2020.  
19 6. Plaintiff also filed an Opposition to the Personal Jurisdiction Motion to Dismiss [ECF No.  
20 41] on March 5, 2020 (“Plaintiff’s Opposition”).  
21 7. Due to technical difficulties, Plaintiff was unable to file the exhibits referenced in Plaintiff’s  
22 Opposition and the declaration attached thereto (the “Exhibits”), on March 5, 2020.  
23 8. Plaintiff informally provided RUAG the Exhibits in support of Plaintiff’s on March 6, 2020  
24 via email.

- 1       9. Plaintiff represents that it will file the updated version of Plaintiff's Opposition reflecting
- 2       citation to those Exhibits<sup>1</sup> and the Exhibits no later than close of business Thursday, March
- 3       12, 2020.
- 4       10. RUAG will not object to Plaintiff's filing the updated version of Plaintiff's Opposition and
- 5       the Exhibits under those conditions..
- 6       11. RUAG's Replies in Support of the Motions are currently due March 12, 2020.
- 7       12. In light of Plaintiff's filing a First Amended Complaint, Plaintiff and RUAG Ammotech
- 8       GmbH agree that the Motion to Dismiss [ECF No. 7] and Motion to Compel Arbitration
- 9       [ECF No. 8] will be withdrawn *without prejudice*.
- 10      13. Plaintiff and RUAG Ammotech GmbH agree that RUAG Ammotech GmbH may have until
- 11      March 23, 2020 to respond to the First Amended Complaint.
- 12      14. Further, Plaintiff and RUAG agree that RUAG's Reply in Support of the Personal
- 13      Jurisdiction Motion to Dismiss will be extended to Monday, March 16, 2020.
- 14      15. This modest extension for filing the Reply – from Thursday, March 12, 2020 to Monday,
- 15      March 16, 2020 – is needed to allow RUAG Hungarian Ammotec, Inc., and RUAG Holding
- 16      AG to fully prepare its Reply, particularly in light of the slight delay in receiving exhibits.
- 17      Likewise, the modest extension for responding to the Amended Complaint – from Thursday,
- 18      March 19, 2020 to Monday, March 23, 2020 is needed and appropriate as RUAG has agreed
- 19      to withdraw two of the complex Motions it filed in response to the original Complaint and
- 20      requires additional time to evaluate and prepare a new response to the First Amended
- 21      Complaint.
- 22      16. Nothing in this Joint Motion, including RUAG's withdrawal of the Motion to Dismiss and
- 23      Motion to Compel Arbitration, is intended to waive the parties' claims or defenses.
- 24      17. This request is sought in good faith and is not made for the purpose of delay.
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28      <sup>1</sup> In other words, the Opposition will be the same in all respects, except that it will include citations to the as-filed Exhibits.

**Snell & Wilmer** L.L.P. 

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DATED: March 12, 2020

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*Attorneys for Plaintiff Archon Firearms Inc.*

DATED: March 12, 2020

By: /s/ Kelly H. Dove

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*Attorneys for Defendants*  
*RUAG Ammotec GmbH, RUAG*  
*Hungarian Ammotec, Inc., and RUAG*  
*Holding AG*

## ORDER

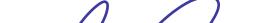
**IT IS HEREBY ORDERED** that the above Joint Motion for Extension of Time, (ECF No. 44), is **GRANTED**.

**IT IS FURTHER ORDERED** that the RUAG Ammotec GMBH's Motion to Dismiss, (ECF No. 7), and Motion to Compel Arbitration, (ECF No. 8), are **WITHDRAWN without prejudice**.

**IT IS FURTHER ORDERED** that RUAG Ammotech GmbH shall have until March 23, 2020, to respond to the First Amended Complaint.

**IT IS FURTHER ORDERED** that RUAG Holding AG and RUAG Hungarian Ammotec, Inc. shall have until March 16, 2020, to reply in support of their Motion to Dismiss, (ECF No. 10).

**DATED** this 16 day of March, 2020.



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Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **JOINT MOTION FOR EXTENSION OF TIME** by method indicated below:

- BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.

Jeffrey A. Dilazzero, Esq.  
975 Bridgeton Pike, Suites A & D  
Sewell, NJ 08080  
*Attorneys for Plaintiff Archon Firearms,  
Inc.*
- BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- BY PERSONAL DELIVERY:** by causing personal delivery by \_\_\_\_\_, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.
- BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

DATED this 12th day of March, 2020.

/s/ Maricris Williams  
An employee of SNELL & WILMER L.L.P.

4849-8011-3847.1